

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

CRAIG CUNNINGHAM,	)	
	)	
Plaintiff,	)	
	)	CASE NO. 3:15 –cv-00846
vs.	)	
	)	
RAPID RESPONSE MONITORING	)	
SERVICES, INC. RUSSELL	)	
MACDONNELL, UTC FIRE AND	)	
SECURITY AMERICA’S CORPORATION,	)	
INC., HOMELAND SECURITY, LLC,	)	
ADAM COURSEY, JOHN KEITH, DAVID	)	
ROMAN, LAURA ROMAN, SECURITY	)	
SYSTEMS, INC. D/B/A SAFEGUARD	)	
AMERICA, AND JOHN/JANE DOE 1-10	)	
	)	
Defendants.	)	

**MOTION TO WITHDRAW AS COUNSEL**

In accordance with Local Rule 83.01(g), Stephen D. Barham, Jeffrey W. Maddux and Chambliss Bahner & Stophel, P.C. (“Withdrawing Counsel”) move to withdraw as counsel for Defendants Homeland Security, LLC, David Roman, Adam Coursey, John Keith, Security Systems, Inc. d/b/a Safeguard America (“Represented Defendants”) and in support of their motion state the following:

Withdrawing Counsel sent the required 14 day notice to the Represented Defendants. See attached Exhibit 1. Withdrawing Counsel represents that withdrawal is appropriate pursuant to Tennessee Rule of Professional Conduct 1.16(b). Withdrawing Counsel has received no objection to their notice of withdrawal from Represented Defendants.

This case is in its early stages and withdrawal of counsel should not delay trial of the case as no scheduling order has been entered.

Consequently, Withdrawing Counsel respectfully request that their Motion to Withdraw be granted and that they be permitted to withdraw and be released from any further responsibility as counsel in this matter. Withdrawing Counsel further requests that the Represented Defendants be given 30 days to locate and retain new counsel.

CHAMBLISS BAHNER & STOPHEL, P.C.

By: /s/ Stephen D. Barham

Stephen D. Barham, BPR #19292

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*Counsel for Defendants, Homeland Security,  
LLC, Security Systems, Inc. d/b/a Safeguard  
Homes, John Keith and Adam Coursey*

CERTIFICATE OF SERVICE

I hereby certify that I filed a copy of this *Motion to Withdraw as Counsel* electronically with the Court on **March 18, 2016** and I served a true and correct copy of same upon the following individuals as follows:

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By: /s/Stephen D. Barham